

REMARKS

By this response, Applicants amend Claims 21 and 22. Therefore, Claims 1-6, 14-17, and 19-23 are pending in the present Application. In view of the above amendment and the following remarks, Applicants respectfully request reconsideration and timely withdrawal of the objections and the pending rejections for the reasons discussed below.

A complete and detailed response follows herewith.

I. CLARIFICATION OF ORIGIN OF PRIORITY DOCUMENTS

In the Office Action, the Examiner states:

Priority

Priority to Japanese Patent Applications 10-2003-0020087 (March 31, 2003) and 10-2003-0038220 (June 13, 2003) is claimed.

Receipt is acknowledged of papers submitted under 35 U.S.C. 119(a)-(d), which papers have been placed of record in the file.

Applicants wish to point out that priority was claimed to Patent Applications originating from the REPUBLIC OF KOREA, having serial numbers which correspond to those stated in the acknowledgement of Priority.

Applicants respectfully request that the Examiner make an affirmative statement in the next official paper, confirming: (a) the country of origin of the Priority Documents, (b) the identifying or serial numbers of these Documents; and (c) the dates corresponding to the filing of these Documents.

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II. OBJECTIONS TO THE CLAIMS**A. Objection To The Claim 21**

Examiner objects to Claim 21 because "the recitation 'a color filter disposed between the first passivation layer and the protrusion and the pixel electrode' is not clear." In response, Applicants insert a comma punctuation mark between the term "the first passivation layer" and the phrase containing the "the protrusion and the pixel electrode" thereby providing clarification consistent with the remainder of the Specification, the Drawings, and the Original Claims. No new matter is added under 35 USC 132.

B. Objection To The Claim 22

Examiner objects to Claim 22 because "the recitation 'a second passivation layer formed on the color filter and the protrusion and the pixel electrode' is not clear."

In response, Applicants amend Claim 22 to reflect that a second passivation layer can be formed on the color filter intermediate to the protrusion and the pixel electrode. As before, this clarification is consistent with the remainder of the Specification, the Drawings, and the Original Claims. No new matter is added under 35 USC 132.

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III. REJECTIONS OF THE CLAIMSA. Rejection of Claims 1-3, 14, and 21-23

Claims 1-3, 14 and 21-23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over United States Patent 6,671,020 (KIM) in view of United States Patent 6,573,965 (LIU).

In response, Applicants respectfully draw the attention of the Examiner to the subject matter of the present Application, as claimed.

Independent Claim 1 explicitly claims, in pertinent part:

a first protrusion formed on the first passivation layer and disposed opposite the data line; and

a pixel electrode formed on the first passivation layer and connected to the drain electrode.

Similarly, independent Claim 14 explicitly claims, in pertinent part:

a pixel electrode formed on the first passivation layer and connected to the drain electrode through the contact hole; and

a protrusion formed on the first passivation layer and disposed in the cutout at least in part.

Clearly, the claimed subject matter plainly calls for a protrusion and a pixel electrode formed on the first passivation layer in both independent Claim 1 and independent Claim 14.

Neither KIM ('020 patent) nor LIU ('065 patent) teach or suggest a thin-film transistor array panel comprising a

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protrusion and a pixel electrode formed on the first passivation layer.

In particular, in the '020 patent, Kim recites:

At least one or more electric field induction windows 51 (slits) are formed in a plurality of specific directions in the pixel electrode.

('020 Patent, Col. 7, lines 13-15)

Also, Kim teaches:

In the multi-domain liquid crystal display device of the present invention, the dielectric structure 53 is formed on the pixel electrode and/or the common auxiliary electrode. Alternatively, the pixel electrode, the passivation film, the gate insulating film, the color filter layer, an overcoat layer, and/or the common electrode are patterned to form the electric field induction window 51 in the shape of a hole or slit.

('020 Patent, Col 9, line 63 to Col. 10, line 3)
[EMPHASIS ADDED]

Thus, KIM ('020) specifically teaches a dielectric structure 53 (protrusion) formed ON the pixel electrode; or, alternatively, an electric field induction window 51 (slit) formed IN the pixel electrode.

Turning to the second reference upon which the rejection of Claims 1-3, 14, and 21-23 are based, LIU ('065) recites:

Referring to FIG. 3, two slits 302 and 303 of a single pixel are formed in a pixel electrode layer on the TFT substrate 301. The pixel electrode is divided into three sections 306-308 by the slits 302 and 303. Bumps 309 to 312 are formed above the slits 302 and 303 and bus lines 304 and 305 respectively. The bumps 309 to 312 are covered with an alignment film layer 313.

('065 patent, col. 4, lines 28-34) [EMPHASIS ADDED]

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LIU ('065), then, specifically teaches that bumps (protrusions) are formed above the slits, which by their very nature, are formed in the pixel electrode. Thus, by force of logic, the bumps (protrusions) in Liu also are formed above the slits in pixel electrode.

Applicants do not claim a protrusion formed on the pixel electrode. Applicants do not claim a protrusion formed above slits in the pixel electrode. Instead, Applicants claim "a first protrusion formed on the first passivation layer and disposed opposite the data line; and a pixel electrode formed on the first passivation layer and connected to the drain electrode."

Applicants respectfully point out that, no matter how KIM is modified by LIU, or vice versa, the bump or protrusion of the resulting structure will always be one formed on or above the pixel electrode, and not on the first passivation layer, as claimed by Applicants.

Therefore, neither KIM nor LIU, alone or in combination, can form a proper basis for an obviousness rejection under 35 U.S.C. §103(a) of independent Claim 1 and properly dependent Claims 2-3, and of independent Claim 14 and properly dependent Claims 21-23.

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Applicants request careful reconsideration and withdrawal of all obviousness rejections under 35 U.S.C. §103(a) against Claims 1-3, 14, and 21-23.

B. Rejection of Claims 1-3, 14, and 21-23

Claims 4-6 and Claims 15-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over United States Patent 6,671,020 (KIM) in view of United States Patent 6,573,965 (LIU) and further in view of United States Patent Application 200210163604 (KIM II).

In response, Applicants respectfully point out that Claims 4-6 properly depend from independent base Claim 1, and that claims 15-17 properly depend from independent base Claim 14. Thus, these dependent claims properly depend from independent claims, which Applicants believe are allowable over the prior art.

In particular, Applicants point out that the obviousness rejections of Claims 4-6 and 15-17 under 35 U.S.C. §103(a) stand upon the same inapt references upon which the foregoing fatally-flawed rejections of Claims 1-3, 14, and 21-23 are based. Neither KIM nor LIU, alone or in combination, can form a proper basis for an obviousness rejection under 35 U.S.C. §103(a), and the additional combination of KIM II is equally insufficient to make out.

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Therefore, neither KIM nor LIU nor KIM II, alone or in any combination, can form a proper basis upon which to make a statutory *prima facie* case of obviousness under 35 U.S.C. §103(a) against Claims 4-6 and Claims 15-17.

Applicants request careful reconsideration and withdrawal of all obviousness rejections under 35 U.S.C. §103(a) against Claims 4-6 and Claims 15-17.

C. Rejection of Claims 1-3, 14, and 21-23

Claims 19-20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over United States Patent 6,671,020 (KIM) in view of United States Patent 6,573,965 (LIU) and further in view of United States Patent 6,897,918 (NONAKA). et al.).

In response, Applicants respectfully point out that Claims 19-20 properly depend from independent base Claim 14. Thus, these dependent claims properly depend from an independent claim, which Applicants believe are allowable over the prior art.

In particular, Applicants point out that the obviousness rejections of Claims 19-20 under 35 U.S.C. §103(a) stands on the same inapt references upon which the foregoing fatally-flawed rejections of Claims 1-3, 14, and 21-23 are based. Neither KIM nor LIU nor NONAKA, alone or in any combination, can form a proper basis upon which to make a statutory *prima*

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facie case of obviousness under 35 U.S.C. §103(a) against Claims 19-20.

Therefore, Applicants request careful reconsideration and withdrawal of all obviousness rejections under 35 U.S.C. §103(a) against Claims 19-20.

IV. CONCLUSION

By this Response, Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated grounds for objection and for rejection have been overcome or rendered moot.

No additional search is indicated or warranted. Applicants consider the amendatory language of Claims 21 and 22 to be fully within scope of any previous searches encompassing the broadest reasonable interpretation consistent with the specification, In re Morris, 127 F.3d 1048, 44 USPQ2d 1023 (Fed. Cir. 1997).

Accordingly, Applicants respectfully submit that Claims 1-6, 14-17, and 19-23, as amended, are in proper form for allowance. Reconsideration and withdrawal of the rejections are respectfully requested and a timely Notice of Allowance is kindly solicited.

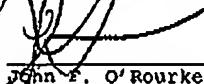
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If there are any questions regarding any aspect of the application, please call the undersigned at (949) 752-7040.

Certificate of Transmission

I hereby certify that this correspondence is being facsimile transmitted to the Commissioner for Patents, Fax No. 571-273-8300 on the date stated below.



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Respectfully submitted,



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